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FILED

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DEPARTMENT OF REAL ESTATE
By B. Williams

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Application of)
12 VERONICA LAINE WILLIAMS-BRANCH,) No. H-3324 FR
13 Respondent.) STATEMENT OF ISSUES

14 The Complainant, BRENDA SMITH, a Supervising Special Investigator of the
15 State of California, for Statement of Issues against VERONICA LAINE WILLIAMS-BRANCH
16 ("Respondent"), is informed and alleges as follows:

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18 Complainant, BRENDA SMITH, a Supervising Special Investigator
19 of the State of California, makes this Statement of Issues in her official capacity.

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21 Respondent made application to the Department of Real Estate of the State of
22 California for a real estate salesperson license on or about August 28, 2018.

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24 On or about August 7, 2017, after proceedings comparable to the Administrative
25 Procedure Act in which Respondent was given fair notice of the charges, an opportunity for a
26 hearing, and other due process protections the State of California, Department of Social Services,
27 in Case No. 6216215201, Respondent's registration as a Trustline Child Care Provider was

1 revoked, and Respondent's corporation, Summerbreeze Inc., license to operate a group home
2 was revoked for acts, if done by a real estate licensee, would be grounds for the suspension or
3 revocation of a California real estate license pursuant to the provisions of Sections 10177(d),
4 and/or 10177(g) of the Business and Professions (Code).

5 MATTERS IN AGGRAVATION

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7 On or about January 20, 1988, in the Superior Court of the State of California,
8 County of Los Angeles, Case No. 88M00115, Respondent was convicted of violating section
9 484(a) of the Penal Code, a misdemeanor.

10 5

11 On or about February 4, 2011, in the Superior Court of the State of California,
12 County of Kern, Case No. BM780739A, Respondent was convicted of violating section 3700.5
13 of the Labor Code, a misdemeanor.

14 GROUND FOR DENIAL

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16 The revocation of Respondent's license as described in Paragraph 3, constitutes
17 cause for denial of Respondent's application for a real estate license under Sections 480(a),
18 10177(f), and/or 10177(g) of the Code.

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1 WHEREFORE, the Complainant prays that the above-entitled matter be set for
2 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
3 authorize the issuance of, and deny the issuance of, a real estate salesperson license to
4 Respondent, and for such other and further relief as may be proper under other provisions of law.

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7 
8 BREND A SMITH
 Supervising Special Investigator

9 Dated at Fresno, California,
10 this 18 day of May, 2020.

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13 DISCOVERY DEMAND

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15 Pursuant to Sections 11507.6, *et seq.* of the *Government Code*, the Department of Real
16 Estate hereby makes demand for discovery pursuant to the guidelines set forth in the
17 *Administrative Procedure Act*. Failure to provide Discovery to the Department of Real Estate
18 may result in the exclusion of witnesses and documents at the hearing or other sanctions that the
19 Office of Administrative Hearings deems appropriate.